

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:)	
)	
SOMERVILLE BREWING COMPANY,)	Chapter 11
)	Case No. 19-13300-FJB
DEBTOR)	
)	

LIMITED OBJECTION OF MASSACHUSETTS GROWTH CAPITAL CORPORATION TO DEBTOR'S FURTHER USE OF CASH COLLATERAL

Massachusetts Growth Capital Corporation ("MGCC"), a secured creditor of Somerville Brewing Company, the above-captioned Chapter 11 Debtor, hereby objects, on a limited basis, to the Debtor's further use of cash collateral pursuant to the *Debtor's Motion for Interim and Final Authorization to Use Cash and Non-Cash Collateral and Request for Emergency Determination* (the "Cash Collateral Motion") [Docket No. 6].

MGCC states as follows in support of its objection:

1. MGCC holds a second priority security interest in all of the assets of the Debtor junior only to the security interest held by Cambridge Trust Company and to property perfected purchase money security interests in equipment of the Debtor, if any. MGCC's security interest is described in paragraph 9 ii. of the Cash Collateral Motion.

2. MGCC, the Debtor and Cambridge Trust Company are negotiating the terms of a further order authorizing the use of cash collateral. MGCC's counsel has only just this morning, at approximately 10:30 a.m., received copies of the Debtor's budget reconciliation for November 2019 and the Debtor's monthly operating report for November 2019 and MGCC has not had a chance to consider and discuss said reports with its counsel.

3. MGCC expects that it will reach agreement with the Debtor and Cambridge Trust Company as to the terms of the Debtor's further use of cash collateral, however, MGCC files this limited objection to preserve its right and standing to oppose the further use of cash collateral in the event that the parties are unable to reach agreement for any reason.

Dated: December 16, 2019

Respectfully submitted,
MASSACHUSETTS GROWTH
CAPITAL CORPORATION
By its attorney,

/s/ James M. Liston
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